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ATTORNEY FOR WOODBROOK, INC.

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>IN RE:</b>	§	
	§	
<b>TEXAS E&amp;P OPERATING, INC.</b>	§	<b>CASE NO. 17-34386</b>
	§	
<b>Debtor</b>	§	

**LIMITED OBJECTION TO TRUSTEE'S MOTION  
FOR AUTHORITY TO SELL PROPERTY**

COMES NOW Woodbrook, Inc. ("Lessor") and files this Limited Objection (the "Objection") to Trustee's Motion for Authority to Sell Property (the "Motion") and states:

1. Lessor is the contract counterparty to the leasehold interest ("Lease") subject to the Motion which the Trustee proposes to sell.
2. Lessor was not served with the Motion.
3. The Lease contains a provision which requires the Lessor's consent to any sale. the Lessor does not know the identity of any proposed purchaser because the Motion reserved the right of the Trustee to solicit and accept other bids. Lessor has not been requested to consent and does not consent to the proposed sale at this time.
4. Furthermore, to the extent that any purchaser will be liable under the Lease under non-bankruptcy law as a successor to the Debtor, the proposed sale cannot

limit Lessor's rights to enforce the Lease (including the obligations of the Debtor to the Lessor) against such purchaser.

5. For the foregoing reasons, Lessor objects to the Motion at this time.

WHEREFORE PREMISES CONSIDERED, Lessor prays that this Court deny the Motion to Sell, or in the alternative, condition any order granting the Motion on resolution of the forgoing objections.

Submitted on June 14, 2018.

Respectfully submitted,

By: /s/ Howard Marc Spector

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